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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
DARRYL KAUFFMAN,  
  
Defendant.

CASE NO. 2:22-CR-00225 DC

STIPULATION SETTING TRIAL DATE AND  
EXCLUDING TIME PERIODS UNDER SPEEDY  
TRIAL ACT; FINDINGS AND ORDER

DATE: January 24, 2025  
TIME: 9:30 a.m.  
COURT: Honorable Dena M. Coggins

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on January 24, 2025.
2. By this stipulation, the parties now moves to vacate the status conference and set this matter for trial beginning on June 2, 2025 at 9:00 a.m. with a trial confirmation on May 2, 2025 at 9:30 a.m. The parties further stipulate and agree that any motions pursuant to Fed.R.Crim.P. will be filed no later than March 14, 2025.
3. The defendant hereby moves to exclude time between January 24, 2025, and June 2, 2025, under Local Code T4.
4. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case

1 includes approximately 47,000 plus pages of investigative reports in electronic form, and some  
2 audio and video files. Counsel also received an external hard drive with a mirror image of the  
3 defendant's business records. All of this discovery has been either produced directly to counsel  
4 and/or made available for inspection and copying.

5 b) Counsel for defendant desires additional time to review the voluminous  
6 discovery, in particular the hard drive of business records, develop the case, conduct  
7 investigation, consult with her client and relevant experts, discuss potential resolution, and  
8 otherwise prepare for trial. Counsel for the defendant has retained a forensic accountant to  
9 complete a forensic accounting analysis of the records with respect to loss amount and restitution  
10 which is not yet complete. Additionally, the United States will also be producing restitution  
11 information for counsel's review. Counsel for the defendant will need additional time review the  
12 forensic accountant's analysis in conjunction with the previously provided discovery and the  
13 restitution spreadsheet.

14 c) Counsel for defendant believes that failure to grant the above-requested  
15 continuance would deny him/her the reasonable time necessary for effective preparation, taking  
16 into account the exercise of due diligence.

17 d) The government does not object to the continuance.

18 e) Based on the above-stated findings, the ends of justice served by continuing the  
19 case as requested outweigh the interest of the public and the defendant in a trial within the  
20 original date prescribed by the Speedy Trial Act.

21 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
22 et seq., within which trial must commence, the time period of January 24, 2025 to June 2, 2025,  
23 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
24 because it results from a continuance granted by the Court at defendant's request on the basis of  
25 the Court's finding that the ends of justice served by taking such action outweigh the best interest  
26 of the public and the defendant in a speedy trial.

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5. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: January 16, 2025

MICHELE BECKWITH  
Acting United States Attorney

/s/ HEIKO P. COPPOLA  
HEIKO P. COPPOLA  
Assistant United States Attorney

Dated: January 16, 2025

/s/ TASHA CHALFANT  
TASHA CHALFANT  
Counsel for Defendant  
DARRYL KAUFFMAN

### ORDER

Good cause appearing, the parties' stipulated request as to scheduling is GRANTED. Accordingly, the Status Conference set for January 24, 2025 is VACATED, a Trial Confirmation hearing is SET for May 2, 2025 at 9:30 a.m. and a Jury Trial is SET to begin on June 2, 2025 at 9:00 a.m. Both hearings will be held in Courtroom 8 before the Honorable Dena M. Coggins. The time period of January 24, 2025 to June 2, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].

IT IS SO ORDERED.

Dated: January 17, 2025

  
Dena Coggins  
United States District Judge